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April 13, 2023

Via ECF

Hon. Katherine H. Parker
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

APPLICATION GRANTED

Katharine H. Parker

Hon. Katharine H. Parker, U.S.M.J. 4/14/2023

Re: *John Doe v. City of New York, et al.*, 22-CV-2690 (PKC) (KHP)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York (the "City"), assigned to the defense of the above-captioned matter. I write to respectfully request, with the consent of all interested parties, an extension of time of one business day from April 14, 2023, to April 17, 2023, to move for an unsealing order. (In that same filing, defendants will respond to plaintiff's filing of April 10, 2023 (ECF No. 52.) Defendants also request a concomitant extension of the time to respond to that motion from April 28, 2023 to May 1, 2023.

The briefing schedule was set by Court Order of April 5, 2023. This is the first request for extension of these deadlines. Counsel for plaintiff, the Drug Enforcement Agency and the Office of the Special Narcotics Prosecutor consent to this request.

This request is necessary because of obligations of defendants' counsel this week which have delayed or will delay completion of the submission, including filings, a deposition and other work in anticipation of a trial scheduled for May 9, 2023, as well as a deposition in this case set for April 14, 2023. Defendants apologize that this request is late under the Court's two-day advance notice requirement; it was not apparent to defendants' counsel until this morning that the deadline could not be met, and defendants counsel then sought consent from the parties to the motion. Defendants regret any inconvenience to the Court and the parties.

We thank the Court for its consideration in this matter.

Respectfully submitted,

Alan H. Scheiner /s/

Alan H. Scheiner

Senior Counsel

cc (via ECF): Counsel for Plaintiff

cc (via email):

Counsel for the Special Narcotics Prosecutor

Counsel for the Drug Enforcement Agency